

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
EASTERN DIVISION**

SELF ADVOCACY SOLUTIONS N.D.,
LEAGUE OF WOMEN VOTERS OF
NORTH DAKOTA, MARIA FALLON
ROMO,

Plaintiffs,

v.

ALVIN JAEGER, in his official capacity as
Secretary of State, DEBBIE NELSON, in her
official capacity as County Auditor of Grand
Forks County,

Defendants.

Case No. 3:20-cv-00071

JOINT MOTION FOR ENTRY OF AN ORDER ON ATTORNEY FEES AND COSTS

Plaintiffs and Defendant Alvin Jaeger (the “Secretary”) (collectively, “the Parties”) respectfully submit this notice of settlement and request for an order on attorney fees and costs. The Parties agree that Plaintiffs are prevailing parties in this matter entitled to their reasonable attorneys’ fees and costs. *See* 42 U.S.C. § 1988. The Parties have conferred and agree that a total sum of \$97,500 is a reasonable amount. The Parties respectfully request the Court enter an Order requiring the Secretary to pay the proceeds as follows: (1) Sarah Vogel: \$6,568.30, (2) Braaten Law Firm: \$6,494.41, (3) Campaign Legal Center: \$84,437.29.

A proposed order to this effect is attached.

Dated this 16th day of October, 2020.

State of North Dakota
Wayne Stenchjem
Attorney General

By: /s/ Matthew A. Sagsveen
Matthew A. Sagsveen
Solicitor General
State Bar ID No. 05613
Office of Attorney General
500 North 9th Street
Bismarck, ND 58501-4509
Telephone (701) 328-3640
Facsimile (701) 328-4300
Email masagsve@nd.gov

By: /s/ David R. Phillips
David R. Phillips
Assistant Attorney General
State Bar ID No. 06116
Office of Attorney General
500 North 9th Street
Bismarck, ND 58501-4509
Telephone (701) 328-3640
Facsimile (701) 328-4300
Email drphillips@nd.gov

Attorneys for Defendant.

By: /s/ Mark P. Gaber
Mark Gaber
Danielle Lang*
Dana Paikowsky*#
Aseem Mulji*#
CAMPAIGN LEGAL CENTER
1101 14th Street NW, Suite 400
Washington, DC 20005
Telephone: (202) 736-2200
mgaber@campaignlegal.org
dlang@campaignlegal.org
dpaikowsky@campaignlegal.org
amulji@campaignlegal.org

* Admitted *pro hac vice*
Licensed in CA only; supervision
by Danielle Lang, a member of the
D.C. Bar

By: /s/ Derrick Braaten
Derrick Braaten
Derrick Braaten (ND#06394)
Carey Goetz (ND #05958)
BRAATEN LAW FIRM
109 North 4th Street, Suite 100
Bismarck, ND 58501
Telephone: (701) 221-2911
derrick@braatenlawfirm.com
carey@braatenlawfirm.com

/s/ Sarah M. Vogel
Sarah M. Vogel (ND#03964)
SARAH VOGEL LAW FIRM
P.O. Box 385
Bismarck, ND 58502-0385
Telephone: (701) 355-6521
sarahvogellaw@gmail.com

Attorneys for Plaintiffs